

Approved: Andrew J. DeFilippis Jason A. Richman
ANDREW J. DEFILIPPIS / JASON A. RICHMAN
Assistant United States Attorneys

Before: THE HONORABLE DEBRA FREEMAN
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA	:	
	:	
- v. -	:	
	:	
JAMES BRADLEY,	:	
a/k/a "Abdullah," and	:	
ARWA MUTHANA,	:	
	:	
Defendants.	:	
	:	
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COMPLAINT

Violations of
18 U.S.C. §§ 2339B & 2

COUNTY OF OFFENSE:
New York

SOUTHERN DISTRICT OF NEW YORK, ss.:

DEREK KIELY, being duly sworn, deposes and says that he is a Task Force Officer with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Attempted Provision of Material Support
and Resources to a Designated Foreign Terrorist Organization)

1. From at least in or about May 2020, up to and including in or about March 2021, in the Southern District of New York and elsewhere, JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants, knowingly attempted to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b) - to wit, services and personnel (including themselves) - to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing of this Complaint, knowing that ISIS was a designated foreign terrorist organization (as defined in

Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B and 2.)

COUNT TWO

(Conspiracy to Provide Material Support
and Resources to a Designated Foreign Terrorist Organization)

2. From at least in or about May 2020, up to and including in or about March 2021, in the Southern District of New York and elsewhere, JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, to wit, ISIS, which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the INA, and is currently designated as such as of the date of the filing of this Complaint.

3. It was a part and an object of the conspiracy that JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants, and others known and unknown, would knowingly provide ISIS with material support and resources - to wit, services and personnel (including themselves) - knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

(Title 18, United States Code, Section 2339B.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

4. I am a Task Force Officer currently assigned to the FBI New York Joint Terrorism Task Force. I have been personally involved in the investigation of this matter, and I base this affidavit on that personal experience, as well as on my conversations with other law enforcement agents, and my

examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

5. As set forth in greater detail below, JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants, are ISIS supporters who attempted to travel to the Middle East to join and fight for ISIS. Since at least in or about May 2020, BRADLEY, who is based in the Bronx, New York, has expressed his support for ISIS and his desire to join the group overseas or commit a terrorist attack in the United States, including in recorded conversations with an undercover officer ("UC-1") with the New York City Police Department ("NYPD"). Among other things, BRADLEY told UC-1 that he wanted to attack soldiers at the United States Military Academy in West Point, New York ("West Point"), and travel to the Middle East or Africa to join ISIS. In addition, BRADLEY has used his social media and other electronic accounts to post and distribute materials promoting ISIS and violent attacks. For example, BRADLEY sent UC-1 videos of speeches by Abu Bakr al-Baghdadi, the now-deceased former leader of ISIS, and of the June 3, 2020 stabbing of an NYPD officer along with a message referring to the perpetrator as "our brother." BRADLEY has also posted images of ISIS flags and armed fighters to his social media accounts.

6. In or about late January 2021, JAMES BRADLEY, a/k/a "Abdullah," the defendant, married ARWA MUTHANA, the defendant, in an Islamic marriage ceremony. Before and after their marriage, BRADLEY and MUTHANA discussed, and then planned and attempted to, travel to the Middle East together in order to join and fight with ISIS. Specifically, in or about early March 2021, BRADLEY traveled from New York to Alabama to visit MUTHANA. BRADLEY and MUTHANA subsequently traveled together to New York in order to begin their journey to join ISIS. BRADLEY told UC-1 that he wanted to travel to the Middle East with MUTHANA via cargo ship to "fight among the rank[s] of the Islamic State." BRADLEY also told a second undercover NYPD officer ("UC-2") that he had a "dream" that he gave the "bay'ah," or oath of allegiance, to Abu Ibrahim al-Hashimi al-Qurashi, the current leader of ISIS. BRADLEY paid UC-2 \$1,000 to gain passage on a cargo ship for BRADLEY and MUTHANA so that they could travel to the Middle East and join ISIS. On or about

March 31, 2021, MUTHANA told UC-2 that MUTHANA wanted to travel to the Middle East so that she, too, could "fight in [the] sake of Allah." When asked about what she would do after traveling, MUTHANA responded, "the State. . . the Islamic State," referring to ISIS.

7. On or about March 31, 2021, the FBI arrested JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants, after they traveled to a seaport in Newark, New Jersey in order to board a cargo ship and begin their journey to join ISIS. Following the arrests, MUTHANA waived her Miranda rights and stated, in substance and in part, that she was willing to fight and kill Americans. The FBI also seized, among other things, what appears to be a hand-drawn image of a jihadi flag commonly used by ISIS from a previous residence of BRADLEY.

The Islamic State of Iraq and al-Sham

8. On or about October 15, 2004, the United States Secretary of State designated al Qaeda in Iraq ("AQI"), then known as Jam' at al Tawid wa' al-Jahid, as a Foreign Terrorist Organization ("FTO") under Section 219 of the INA and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham, The Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production. On or about September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS (which is the name used hereinafter). To date, ISIS remains a designated FTO.

9. Based on my participation in this investigation and my review of open source reporting, I know, among other things, that on or about September 21, 2014, then-ISIS spokesperson Abu Muhammad al-Adnani ("Adnani") issued a recorded statement calling for attacks against citizens – civilian or military – of the countries participating in the United States-led coalition against ISIS. Adnani specifically called for suicide bombings, shootings, and vehicle attacks.

10. ISIS members and associates make and have made public statements and issued public declarations, which, among other

things, (a) proclaimed and acknowledged that acts of violence had been committed by ISIS; (b) threatened future acts of violence if ISIS's demands were not met; and (c) were intended to promote and foster the prestige and standing of ISIS. ISIS has claimed responsibility for the following terrorist attacks, among others: (i) on or about November 13 and 14, 2015, a group of attackers carried out attacks in Paris, France, which killed approximately 130 people; (ii) on or about March 22, 2016, a group of attackers carried out bombings in Brussels, Belgium, which killed at least 32 people; and (iii) on or about July 14, 2016, an attacker used a truck to run over civilians in Nice, France, killing more than 80 people and injuring more than 300.

11. To gain supporters, ISIS, like many other terrorist organizations, spreads its message using social media, Internet platforms, and email. Using these platforms, ISIS has disseminated a wide variety of recruiting materials and propaganda through social media, which includes photographs and videos depicting ISIS activities, including beheadings and other atrocities, as well as audio and video lectures by members of ISIS and members of other Islamic extremist organizations.

12. Among other Internet and social media platforms, ISIS has popularized the use of end-to-end encrypted communication services and applications as a means of recruiting, communicating with, and disseminating terrorist training materials and propaganda to its members and supporters. ISIS members and supporters use various applications to communicate.

BRADLEY's Devotion to ISIS and Communications with UC-1

13. Based on my participation in this investigation, including my conversations with UC-1, my review of recordings made by UC-1 and UC-2,¹ and my review of draft transcripts and summaries of these recordings, I have learned the following, in substance and in part:

¹ UC-1 and UC-2 recorded meetings with BRADLEY and MUTHANA referenced herein, which meetings were conducted in English with some Arabic, using a video and/or audio recording device. All quotations, transcriptions, or summaries of these meetings, and any translations of Arabic text or communications, are drafts and are subject to revision. All communications quoted herein were in English unless otherwise noted.

a. In or about 2019, JAMES BRADLEY, a/k/a "Abdullah," the defendant, and another New York City-based individual ("Individual-1") planned to travel to Afghanistan to join the Taliban and attack American soldiers fighting in Afghanistan. While BRADLEY ultimately decided not to travel to join the Taliban – due in part to his stated concerns that Individual-1's travel did not adhere strictly enough to BRADLEY's ideological and religious convictions – Individual-1 was arrested on or about July 26, 2019 at John F. Kennedy International Airport as he attempted to board a plane bound for Thailand, for the purpose of subsequently joining the Taliban in Afghanistan. Individual-1 is pending trial in this District on charges of, among other things, attempting to provide material support for acts of terrorism. On the same date as Individual-1's arrest, BRADLEY participated in a voluntary interview with the FBI, during which BRADLEY stated, in substance and in part, that (i) he had intended to travel with Individual-1 to join the Taliban and become a martyr, but decided not to travel; (ii) BRADLEY did not support ISIS because of the widespread killing of innocent Muslims, but did not consider the American military to be innocent; and (iii) if a legitimate Islamic State in Afghanistan was established, he would travel there and pledge his allegiance to the Islamic State. Since that time, as described below, BRADLEY has continued to express his desire to carry out violence in support of radical Islamic ideology, directed his support and allegiance to ISIS, and attempted to travel overseas to join and fight for ISIS.

b. On or about May 27, 2020, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY told UC-1 that he believed that ISIS may be good for Muslims because ISIS was establishing a caliphate.²

ii. BRADLEY stated that if he could do "something" he would – which I understand, based on my training, experience, and participation in this investigation, to be a reference to carrying out an attack. BRADLEY explained that he did not mean killing innocent people, but instead that he would attack soldiers in places like West Point. BRADLEY further explained that if he could

² Based on my training and experience, I have learned that a "caliphate" means an Islamic state under the leadership of an Islamic leader, and that one of ISIS's expressed goals is to create a global caliphate.

not leave the United States because he might be on a terrorism watch list, he would do "something" in the United States instead.

c. On or about June 6, 2020, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY told UC-1 that he wanted to obtain a truck in order to start a construction business and for "something else."

ii. BRADLEY explained to UC-1 that he did not want to hurt civilians.

iii. BRADLEY again told UC-1 that he aspired to carry out an attack at West Point, and discussed potentially seeking to obtain a bomb or ammunition to carry out such an attack.

d. On or about June 18, 2020, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, BRADLEY stated to UC-1, in substance and in part, that his plan to attack a military base was something he really wanted to do and that it would be his contribution to the cause of jihad.³

e. On or about July 26, 2020, BRADLEY sent UC-1 three videos on an encrypted messaging application. Based on my review of the three videos and my conversations with other law enforcement officers and linguists, I have learned, in substance and in part, the following:

i. One of the videos is approximately five minutes long and contains footage of Abu Bakr al-Baghdadi, the now-deceased former leader of ISIS, speaking in English and promoting ISIS and its cause.

ii. One of the videos is approximately two minutes and 30 seconds long and depicts individuals who claim to be from ISIS forcing a prisoner dressed in an orange jumpsuit to dig his own grave before shooting him in the head.

iii. One of the videos is approximately one minute and 30 seconds long and depicts unknown males shooting uniformed military soldiers in the head.

³ Based on my training and experience, I have learned that "jihad" is an Arabic word meaning "struggle," and is often used by ISIS and other extremist groups to mean a fight against the enemies of Islam, or a "holy war."

f. On or about September 17, 2020, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY told UC-1 that BRADLEY planned to travel to Saudi Arabia, where his fiancé in Canada and his wife in Chile would meet him before traveling together to Yemen.

ii. When UC-1 asked BRADLEY why he wanted to travel to Yemen, BRADLEY responded that "we have a chapter there." Based on my training, experience, and participation in this investigation, I believe that "chapter" was a reference to a chapter within ISIS.

g. On or about October 22, 2020, BRADLEY sent UC-1 a video clip which showed, in part, the June 3, 2020 stabbing of an NYPD officer by an attacker ("Attacker-1"). Along with the video, BRADLEY wrote to UC-1 "Allahu Akbar check this out! Our brother." Based on my training and experience, I know that "Allahu Akbar" is an Arabic phrase that means "God is great" and is often used as a celebratory phrase.

h. On or about October 23, 2020, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY told UC-1 that Attacker-1 likely committed the stabbing attack because Attacker-1 was unable to leave the United States.

ii. BRADLEY told UC-1 that if the FBI came to arrest BRADLEY, he would shut the door, go nuts, grab a knife, and do something. BRADLEY then stated, "bro . . . if I get into it and I get them, and they get me then I'm martyred."

i. On or about November 6, 2020, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY told UC-1 that he planned to drive to Canada and fly to Pakistan with one of his wives, his brother-in-law, and his cousin.

ii. BRADLEY stated that he planned to travel to Afghanistan from Pakistan. When UC-1 asked BRADLEY which group he would be joining there, BRADLEY responded, "ISIS, bro." BRADLEY further stated that he intended to fight against the Taliban, American troops, and other illegitimate authority.

BRADLEY's Support for ISIS and Terrorist Ideology on Social Media

14. Based on my participation in this investigation, including my review of law enforcement reports, materials received pursuant to court-authorized search warrants, and publicly-available materials, I have learned, in substance and in part, the following:

a. On or about November 19, 2020, JAMES BRADLEY, a/k/a "Abdullah," the defendant, posted the following photograph on one of his Instagram accounts ("Bradley Instagram-1"),⁴ depicting a man walking in the desert with a backpack and what I believe, based on my training and experience, to be a portion of the flag used by ISIS in the background:⁵



b. On or about November 21, 2020, BRADLEY posted the following photograph of men carrying what appear to be machine guns on Bradley Instagram-1, along with text reading, in Arabic, "In the name of God the most merciful."

⁴ BRADLEY identified Bradley Instagram-1 as his account during communications with UC-1.

⁵ This and other posts to Bradley Instagram-1 contained the purported disclaimer "[i]ntended for research and analysis purposes only." Based on my training, experience, and participation in this investigation, I believe that BRADLEY included this disclaimer in order to conceal his support for ISIS and to evade or minimize law enforcement scrutiny.



c. On or about November 26, 2020, BRADLEY posted the following photograph on Bradley Instagram-1, depicting, in part, Usama bin Laden:



**BRADLEY and MUTHANA Attempt to Travel to
Join ISIS in the Middle East**

15. Based on my participation in this investigation, including my conversations with UC-1 and UC-2, my review of

recordings made by UC-1 and UC-2, and my review of draft transcripts and summaries of these recordings, I have learned the following, in substance and in part:

a. On or about December 15, 2020, UC-1 met with JAMES BRADLEY, a/k/a "Abdullah," the defendant, in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY told UC-1 that an associate had told BRADLEY that BRADLEY would not be allowed to fly on an airplane because of the open criminal case involving Individual-1.

ii. BRADLEY further told UC-1 that it was "bad for them" if he could not fly, because "if I can't leave, they will see that it's bad for them."

iii. UC-1 then asked BRADLEY if "bad for them" was a reference to BRADLEY's "Plan B," a term that BRADLEY had previously used to describe his plan to attack West Point or otherwise commit an act of violence in the United States. BRADLEY responded "yup."

b. On or about January 1, 2021, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY said to UC-1 "bro I am torn between Plan A or Plan B." Based on my participation in this investigation, including my review of recordings and summaries of prior meetings between BRADLEY and UC-1, I believe that BRADLEY was referring to his choice between attempting to travel overseas to join ISIS ("Plan A") or remaining in the United States to conduct an attack ("Plan B").

ii. BRADLEY mentioned to UC-1 a particular University ("University-1") in New York State where he frequently saw Reserve Officer Training Corps ("ROTC") cadets training. BRADLEY stated that he could use his truck and that he along with his "wife" (who I understand to be ARWA MUTHANA, the defendant, based on my

training, experience, and participation in this investigation) could take all of the ROTC Officers "out."⁶

iii. BRADLEY told UC-1 that a former relative from Canada was trying to come to the United States, and that when he arrived, he would "join me and take these guys out," which I believe, based on my training, experience, and participation in this investigation, was referring to the ROTC officers at University-1.

c. On or about January 29, 2021, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY informed UC-1 that "the sister" (which I understand, based on my participation in this investigation, to be a reference to MUTHANA) intended to travel to the United Kingdom later this year.

ii. BRADLEY said he would travel with MUTHANA to the United Kingdom, and then travel to Gambia with MUTHANA so that he could teach. When UC-1 asked BRADLEY if he would join al Qaeda, BRADLEY responded "[n]ot AQ. AQ is over with, man. These people ally with the governments." BRADLEY explained that in Somalia and other places there are "brothers," which I understand, based on my training, experience, and participation in this investigation, to be a reference to ISIS members.

d. On or about February 26, 2021, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY and UC-1 discussed the possibility that BRADLEY and MUTHANA would travel to Yemen via Abu Dhabi, United Arab Emirates.

ii. BRADLEY told UC-1 that he intended to travel to Aden, Yemen, for the purpose of joining the "Islamic [S]tate" and

⁶ Based on my participation in this investigation, including my review of law enforcement reports regarding BRADLEY's communications with UC-1, I have learned that BRADLEY and MUTHANA were not married at this time but later were married in an Islamic wedding ceremony in or about late January 2021.

"the brothers," i.e., ISIS. In particular, the following exchange, in part, occurred:

BRADLEY: Aden, that's the name of the place.

UC-1: That's a town?

BRADLEY: Yeah, yeah Aden, Abyan . . . Aden, they are going to give victory to Islam, and look who is in Aden today[.]

UC-1: Who?

BRADLEY: The Islamic state

UC-1: They are there?

BRADLEY: Yeah Inshallah.

UC-1: That's what I am asking you.

BRADLEY: That's the only place that they are.

UC-1: Right now today?

BRADLEY: Right now today, it's the last territory they have.

[. . .]

UC-1: So what I'm saying, are you going to join the brothers in Aden?

BRADLEY: Yeah well if I found them yeah, but if I don't find them I just keep going to Somalia.

e. On or about March 6, 2021, BRADLEY traveled via commercial airline from New York to Birmingham, Alabama, where he visited MUTHANA.

f. On or about March 7, 2021, BRADLEY and MUTHANA traveled to New York via bus and checked into a hotel in Manhattan, New York ("Hotel-1").

g. On or about March 12, 2021, UC-1 met with BRADLEY in or around the Bronx, New York. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY told UC-1 that BRADLEY and MUTHANA had researched how to get an expedited passport for MUTHANA (who unlike BRADLEY did not have a passport with her in New York), but that BRADLEY believed based on his research that there is a nationwide shutdown of expedited passport appointments due to COVID-19.

ii. BRADLEY raised the possibility of UC-1 helping BRADLEY and MUTHANA get on a cargo ship to travel to Asia or Africa.

iii. UC-1 stated that he could possibly help them get to Morocco on a cargo ship but was not sure. BRADLEY replied that he could make it to Libya, Egypt, or Somalia from Morocco and each of those places was a "war zone" like Yemen. UC-1 asked BRADLEY whether "the brothers" (a reference to ISIS) were there. BRADLEY replied "yes, they are all over."

iv. UC-1 stated to BRADLEY that UC-1 would need a couple of days to speak with his friend and see what the friend could do.

h. On or about March 14, 2021, BRADLEY informed UC-1 via a messaging application that BRADLEY and MUTHANA had made reservations to check into a different hotel located in New Jersey.

i. Later on March 14, 2021, UC-1 drove BRADLEY and MUTHANA to the hotel in New Jersey. During the drive, BRADLEY asked if UC-1 had heard from UC-1's friend in connection with the cargo ship. UC-1 responded that he had not heard back from his friend, but that when UC-1 did hear from the friend, they could talk about it in person.

j. On or about March 17, 2021, UC-1 met with BRADLEY in New Jersey. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY asked UC-1, "You got news for me?" to which UC-1 responded, "News from which brother? Passport?"

ii. BRADLEY replied, "Nah bro, the boat man. Allah uh Akhbar [God is great], Alhamdulillah [praise be to God]. My wife was so happy bro." Based on my participation in this investigation, I believe that BRADLEY was referring to MUTHANA.

iii. UC-1 then stated, "Maybe by tomorrow, tomorrow afternoon, I'm not sure, he's going to go give me their contact's phone number who deals with everything, who manages everything." BRADLEY then stated, "Allah uh Akhbar [God is great]."

iv. UC-1 then stated to BRADLEY, "I am going to give it [the phone number] to you. You are going to call him and I think you'd say something as far as like you're the traveler."

k. On or about March 18, 2021, BRADLEY and UC-1 exchanged a series of electronic messages in which UC-1 provided BRADLEY with a phone number ("Phone Number-1") for UC-1's "friend" who purportedly could facilitate BRADLEY traveling overseas on a cargo ship to join ISIS, and who was in fact UC-2.

l. On or about March 18, 2021, BRADLEY exchanged a series of electronic messages with UC-2 at Phone Number-1. During the course of this message exchange, BRADLEY wrote to UC-2 "[I] was given your number, me and my wife are the travelers." BRADLEY and UC-2 then made plans to meet the following day.

m. On or about the following day, March 19, 2021, UC-2 met with BRADLEY and MUTHANA in New Jersey. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY told UC-2 that because BRADLEY could not fly, and MUTHANA did not have a passport, they were looking to travel by cargo ship.

ii. UC-2 asked BRADLEY what his plans were after his "hijrah," an Arabic word meaning "migration." BRADLEY initially responded that he wanted to "maybe like study, or just live, you know." When UC-2 conveyed that BRADLEY would have to be "100% honest" with UC-2 about his true intentions, the following exchange occurred in Arabic, in which BRADLEY explained that, as he had previously informed UC-1, the purpose of his travel to the Middle East was to join and fight for ISIS:

BRADLEY: . . . after, hijrah to fight among the rank[s] of the Islamic state.

UC-2: With the Islamic state?

BRADLEY: God willing.

UC-2: God willing, with the Islamic state?

BRADLEY: The state that rules under the Sharia law and fight the enemies.

UC-2: Thank God, Thank God. . . Now I feel like its worth me taking that risk.

BRADLEY: May God bless you.

UC-2: So now that I know that you are going to the right people, I'm going to do my best to get you there safely.

BRADLEY: May Allah bless you.

n. On or about March 23, 2021, UC-2 met with BRADLEY in New Jersey. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY paid UC-2 \$1,000 in cash as travel costs for BRADLEY and MUTHANA to take the cargo ship to Yemen.

ii. BRADLEY told UC-2 that BRADLEY and MUTHANA planned to be "fighting" after arriving in the Middle East. With regard to MUTHANA, BRADLEY stated, "so she told me, when you asked her what you wanted to do, she was shy to tell you fighting."

iii. BRADLEY also explained to UC-2 that he "used to make a lot of different plans." BRADLEY further explained that previously he had wanted to go to Pakistan to buy a gun before traveling to Yemen. BRADLEY told UC-2 that after getting the weapon he had planned to travel to "Khorasan State." Based on my training, experience, and participation in this investigation, I believe that BRADLEY was referring to the Islamic State Khorasan, or IS-K, which is a branch of ISIS active in Iran, Central Asia, Afghanistan, and Pakistan.

iv. BRADLEY told UC-2 that he had a dream that he had given "bay'ah," an Arabic term meaning the oath of allegiance, to Abu Ibrahim al-hashimi al-Qurashi, the current leader of ISIS.

v. BRADLEY told UC-2 that he planned to throw his ID and passport "in the water" during the trip so that "if I were to get arrested what are they gonna say they don't know where I'm from nothing you know, they cant send me back here they got no evidence."

o. On or about March 25, 2021, UC-2 met with BRADLEY in New Jersey. During the course of this meeting, the following occurred, in substance and in part:

i. BRADLEY informed UC-2 that BRADLEY had purchased waterproof clothing and boots for himself and MUTHANA for the trip on the cargo ship.

ii. UC-2 told BRADLEY that the cargo ship would be leaving on Wednesday, March 31. BRADLEY praised Allah and confirmed he and MUTHANA planned to travel on the ship.

p. On or about March 31, 2021, BRADLEY and MUTHANA traveled to a location in New Jersey for the purpose of meeting with UC-2 and then entering a seaport in order to board a cargo ship that they believed was destined for Yemen. During the course of this meeting, MUTHANA stated to UC-2, in Arabic, regarding her intentions in traveling aboard the cargo ship: "[M]y first intention is Hijra in the sake of Allah. And you know, if Allah has willed, like I mentioned earlier, to fight in sake of Allah. . . ." The following additional exchange also occurred in Arabic, in BRADLEY's presence:

UC-2: [] Allah is the greatest. . . But do you have a vision of who you want to fight with? Because I spoke to brother Abdullah [BRADLEY] before . . .

MUTHANA: Yes.

UC-2: There's many factions in Yemen . . . []

MUTHANA: The State . . . The Islamic State.

UC-2: The Islamic state, Allah is great, sister. . . []

BRADLEY: Glory be to Allah, Allah is Great.

q. Soon thereafter, UC-2 dropped BRADLEY and MUTHANA off at a seaport in Newark, New Jersey. BRADLEY and MUTHANA then walked up a gangplank towards the aforementioned cargo ship that UC-2 had identified for them, at which point the FBI arrested BRADLEY and MUTHANA.

r. Subsequent to the arrests, MUTHANA waived her Miranda rights and stated during an interview, in substance and in part, that she was willing to fight and kill Americans if it was for Allah.

s. On or about March 31, 2021, in connection with a court-authorized search, the FBI seized from a bedroom previously used by BRADLEY in a residence in or around the Bronx, New York, what appears to be a hand-drawn image of a jihadi flag commonly used by ISIS and a hand-drawn map of the Pakistan region. Written on the

map was a note which read, "sneak through." In a related court-authorized search, the FBI seized a machete from BRADLEY's truck.

WHEREFORE, deponent prays that JAMES BRADLEY, a/k/a "Abdullah," and ARWA MUTHANA, the defendants, be imprisoned or bailed, as the case may be.

s/Derek Kiely, by the Court, with permission
DEREK KIELY, TASK FORCE OFFICER
FEDERAL BUREAU OF INVESTIGATION

Sworn to me through the transmission of this
Complaint by reliable electronic means, pursuant to
Federal Rule of Criminal Procedure 4.1, this
1st day of April, 2021

(by telephone)



THE HONORABLE DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK